

SCHOOL AD MATCH
Frequently Asked Questions (FAQs)

NOTE: NEW Questions/Answers are labeled.

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A. GENERAL QUESTIONS

1. **NEW QUESTION:** I work for a consulting firm that services 120+ school districts in the state regarding the Administrative Match program. I know we do not have a contract with you. I also know DSHS's contract is with the districts. Having said that, I would like to make the following request. When Karen Blackshear emails the districts their copy of the A-19 can she please email a copy to me also? If I could receive this copy I would have the correct numbers to put in, such as contract number, vender number, and sub sub obj number.

Answer: No we won't copy your company. Perhaps it would help if I explain why the issues you mention, (that your firm does not have a contract with DSHS, and that DSHS contracts with the districts) are important to my administration. We are holding the districts accountable for performance under the contract, not their consultant. For that reason we do not want to put the districts in the position of the Medicaid office having accepted from anyone other than themselves, any document or change in information which is tied to their performance, or reimbursement for performance under the agreement, no matter how minor in nature.

2. **What is the driving force behind the changes in Admin Match?**

Compliance with the Centers for Medicare and Medicaid Services (CMS) Medicaid School-Based Administrative Claiming Guide. The effective date of the guide for Washington is December 1, 2003.

3. Does School Administrative Match come under the Health Insurance Portability and Accountability Act (HIPAA)?

No. The medicaid program comes under HIPAA. However, at this time our School Ad Match part of the program is not using any personal health information. On the other hand, OSPI, Department of Education or School District policies regarding confidentiality of information may apply. If so please advise MAA of any data sharing restrictions you anticipate.

4. Will Medical Assistance Administration (MAA) provide district-wide support if the School Districts are audited?

MAA and OSPI have jointly met with the State Auditor's office to provide information regarding the changes in School Ad Match effective December 2003. That coordination can continue but can not address any audit concern regarding Ad Match services provided prior to December 2003.

5. NEW QUESTION: Do I have to use MAA forms and materials for training I provide and for time study participants?

The contract Statement of Work requires that you receive MAA instructions and training, that you complete the time study per instructions and that staff complete the documents required in the Manual. The district Ad Match coordinator must be trained by MAA staff. Other training must simply use MAA's material. The MAA "Manual" is found on the web at <http://maa.dshs.wa.gov>.

6. NEW QUESTION: As district coordinator, how will I know that Admin Match related materials, information and requests I receive, are from the state Medical Assistance Administration?

The materials and information provided by MAA's Ad Match Section will normally be available on the MAA website. If you receive requests, information or forms by email, and you are unsure of the source, check the address of the entity that sent the materials or questions. The suffix of the address for materials from MAA will always be @dshs.wa.gov. If you are unsure of the source or the validity of the request from MAA's point of view, check the MAA Website or contact Dick Hancock at 360.725.1870 or hancodj@dshs.wa.gov.

7. How will MAA address the complexity of "activities" which will make training difficult and increase the likelihood of errors?

MAA will continue to provide training and technical assistance to Districts on allowable activities. Training may either be provided directly by MAA or be contracted by MAA to the Educational Service District(s). The PowerPoint presentations are posted on the MAA website to help you with your training needs, including the presentation on examples of allowable activities. These

PowerPoint presentations and other information can be viewed at:
<http://maa.dshs.wa.gov> and click on Admin Match/Schools

8. Is the new federal Medicaid School-Based Administrative Claiming Guide on the MAA website?

Yes, just go to <http://maa.dshs.wa.gov> and click on Admin Match/Schools

9. What is the impact on the program and/or the changes if a number of districts drop out?

School Administrative Match is one optional way for the State Medicaid agency to reach potentially eligible children and their families. Until there are measures of the effectiveness of School Ad Match and baseline data regarding performance, it is not possible to quantify the impact on children and their families, of having some districts drop out.

10. Will there be an upper limit on the fee (currently 3%) that MAA will charge school districts?

No. None has been included in the December 1, 2003 contract because of the uncertain amount of Ad Match activity to be provided after December. However, the contract provides that MAA will annually adjust the fee at the close of the state fiscal year based on prior state fiscal year and projected ensuing fiscal year costs.

The fee was initiated with bills (A-19s) processed on or after February 1, 2003. In late July 2004, a report will be provided to contracting districts of fee revenue and expenses from February 2003 forward, plus obligated and anticipated expenses and fee revenue for the 2004-05 fiscal year.

The 3% fee will be adjusted prospectively if, in MAA's judgement, the percentage is too high or low. If too high, and the historical plus projected expenditures are less than historical and projected fee revenue, the percentage fee will be adjusted and the excess fee revenue as estimated by MAA, will be reimbursed to districts in proportion to the amount they have paid to MAA.

11. NEW QUESTION: How will MAA spend the 3% it is withholding from the reimbursements? SD would like to see a budget and a cap on the 3%.

The work that has been funded to date includes the cost of:

- The advisory committee
- MAA staff and related administrative service
- Consultants regarding the Time Study, Ad Match Activities and Information Technology (system development)

- Future contract for program monitoring, training and Technical Assistance

(If other costs are incurred they will be reported as noted in the question above.)

12. REVISED QUESTION: Who should the district call regarding their bill for services (A-19)?

Please call or e-mail Karen Blackshear at MAA regarding your A-19. Karen is at (360) 725-1864 or Blackks@dshs.wa.gov.

13. REVISED QUESTION: Will districts get a template for the Service Delivery Plan (SDP) and how will it be used?

Yes. It is included as Exhibit B in the new contract. Many of the districts have written SDPs that do not reflect the unique characteristics of their locality and their strategy for assisting students and families to access Medicaid coverage and services. Also by including the SDP, rather than the SDP template, in the contract, updating the plan would require a contract amendment. For that reason, MAA will be amending the contract to remove the plan from the contract. It is still the intent of MAA, and the opportunity for districts to understand the Medicaid related needs of their students and to plan, design and manage their staffing and procedural approach to meeting those needs.

14. What will happen if districts don't report their enrollments to OSPI in time to compute the new MER?

Without the MER, the reimbursable amount of District Ad Match costs can not be computed for activity codes 5b, 6b, 7b, 8b and 9b (see the Time Study form). The MER is applied to the district's cost of each of these activities.

NEW INFORMATION: If you have questions about your enrollment data, contact OSPI Customer Support, 1-800-725-4311 or by email at customersupport@ospi.wednet.edu

15. Would it be possible to include legal permanent residents not eligible for Medicaid in the MER calculation?

No. A student can only be included in the MER if his/her school enrollment identifying information matches with Medicaid enrollment data. (By the way, the greatest likelihood of a match is when the district information is the child's name used on their Social Security Card.)

16. Will districts get clarification on the issue of payment to consultants?

Yes. The contract Statement of Work, has wording on page 7 that clarifies the issue.

17. What are the requirements for summer school?

Participating districts that have a fourth or summer quarter, must notify MAA and at least one month prior to the summer quarter start. MAA will need to know the start and end dates plus non-school days during the quarter. MAA will work with the district to clarify any questions about the time study, etc.

18. Are MAA's school Ad Match forms State or Federal forms?

They are MAA forms.

19. What are the most substantive changes in the new federal requirements?

First, time study results must meet statistical standards of + or - 5 percent error rate (the federal dollars claimed should be no more than 5% above or below valid (reimbursable) statewide school district costs. Secondly, CMS has clarified "free care" in the new School Ad Match guide. Medicaid will not reimburse school costs for health related activities that would have been provided to all students by the district, based on education requirements or policy. (The district would not have charged the students for the services).

20. NEW QUESTION: My district is not sure about participating in Ad Match services in this first quarter (beginning December 1st), but doesn't want to lose the opportunity to participate later on. What obligations does my district incur by signing the agreement?

From the date an interlocal agreement (contract) is executed, the signing parties are obligated to perform all their duties as described in the agreement, as of the start date of the contract (in this case, December 1, 2003). One party may waive the other party's compliance with one or more terms or conditions. However, Federal and State auditors will expect MAA to require that those parties with which the state contracts abide by the terms and conditions of the contract, unless we can show in the official contract file that there is a justifiable reason for the contractor not to comply. MAA also should show that an effort was made to either obtain compliance or to get the term or condition in question altered or removed.

If the contract has not been executed, both parties may agree to change the start date of the contract. If the contract has been executed, and both parties want to change the start date, the contract will need to be "terminated for convenience" and a new contract with an agreed new start date created. In this case, notify MAA in writing of your plan to terminate the agreement and initiate a later start date.

B. MEDICAID – (General Medicaid Information – Eligibility, Services, etc.)

- 1. Does assisting families to gather check stubs or other income verification needed to apply for Medicaid, violate the Family Educational Rights and Privacy Act?**

District staff do not need to read, receive or retain any confidential personal information from students or family for purposes of the family's applying for Medicaid. District staff can educate the family about what documents are required in the Medicaid application process.

- 2. Why is MAA asking district staff to have basic knowledge about Medicaid, such as knowing who the Medicaid providers are?**

The program is about Medicaid and providing services/access to Medicaid eligibles. Staff should have some basic knowledge of Medicaid so they can help families with the application process and accessing covered services. MAA helps with this process by providing lists of providers that accept Medicaid, such as lists of Community Health Centers, Federally Qualified Health Centers, Rural Health Centers and the Provider Directory. These lists were included in the statewide training packets.

- 3. Will districts get lists of providers who accept Medicaid and information on best practices for getting kids/families on Medicaid?**

MAA is working to develop the list by area however providers who have a full panel of patients, are sometimes reluctant to be on such a list. Children enrolled in **Healthy Options** are assured access within their plan. See MAA's Ad Match/Schools web page or <http://maa.dshs.wa.gov/HealthyOptions>

NEW INFORMATION: For mental health services contact the Regional Support Network in your area. Click on the map location nearest you on the following: http://mhdsq12.mhd.dshs.wa.gov/mhdscrip/asp/general/MHD_Hom_Page.asp. For the nearest Family Planning Services phone number and address, go Family Planning link on the MAA web page. For non Healthy Options medical and dental providers, one option is to call your Dental or Medical Society office to ask for assistance.

- 4. Regarding Medicaid eligibility, what will be the role of educators in verifying income, especially for homeless kids?**

Educators could advise children or families that they will need to be able to verify their income, but would not be expected to ask about or actually verify income. Only the DSHS Community Service Office can determine eligibility.

5. Is there retroactive coverage under Medicaid?

Yes, retroactive coverage is available. If the family is found eligible for Medicaid and has unpaid medical bills prior to the eligibility start date, the eligibility start date can be moved back to cover the previous 3 months from date of application, if the family was eligible for Medicaid during that period.

C. AD MATCH GOALS AND PERFORMANCE MEASURES

1. Does the federal government or the CMS Claiming Guide require that there be Goals and Performance Measures?

No. The federal requirement addresses accountability for expenditures, that is, the Guide delineates criteria for claimable Ad Match activities and requires increased documentation.

2. If performance measures are not required by CMS, then why is MAA requiring these?

School Ad Match is an optional program for MAA to use to improve access to Medicaid for eligible children. (About 17 states have School Ad Match.) MAA is assessing the effectiveness of School Ad Match in a stepwise process. Measures will be defined by MAA with the assistance of the ESD/School Districts Advisory Committee. A baseline level of productivity will then be tracked during the 2004-05 school year, followed by setting of goals for 2005-06.

3. What performance measures will MAA require?

The Advisory Committee which includes one representative from each Educational Service District (ESD) and one School District (SD) from each region, plus two staff from the Office of the Superintendent of Public Instruction (OSPI), is working with MAA to define a limited and pragmatic list of measures. The committee meets at least quarterly and performance measures are planned for the 2004-05 school year.

D. CONTRACTS

1. NEW QUESTION: My district is not sure about participating in Ad Match services in this first quarter (beginning December 1st), but doesn't want to lose the opportunity to participate later on. What obligations does my district incur by signing the agreement?

From the date an interlocal agreement (contract) is executed, the signing parties are obligated to perform all their duties as described in the agreement, as of the start date of the contract (in this case, December 1, 2003). One party may waive the other party's compliance with one or more terms or conditions. However, Federal and State auditors will expect MAA to require that those parties with which the state contracts abide by the terms and conditions of the contract, unless we can show in the official contract file that there is a justifiable reason for the contractor not to comply. MAA also should show that an effort was made to either obtain compliance or to get the term or condition in question altered or removed.

If the contract has not been executed, both parties may agree to change the start date of the contract. If the contract has been executed, and both parties want to change the start date, the contract will need to be “terminated for convenience” and a new contract with an agreed new start date created. In this case, notify MAA in writing of your decision.

2. How long do the new agreements with MAA last?

New agreements were effective December 1, 2003 and go through June 2005.

3. How flexible is the deadline for signing the contract because school districts need school board approval?

The effective (start) date of the new contract is December 1, 2003. However, the agreement can be signed after December first. The district can not be assured of payment until the contract is signed by the district and by MAA.

Tasks associated with implementing the agreement include:

- The district must identify for MAA, a district employee (or employees, if the responsibility is shared) who is the district's Ad Match Coordinator. That person (or persons) must have received training performed by MAA.
- The district must complete and submit to MAA, a Service Delivery Plan.
- The district must have reviewed and approved MAA's record of the district's school calendar.
- The district must have notified MAA that participants will be either all eligible staff or the district will provide to MAA a list of designated staff who will complete the time study. (Ad Match costs are claimable only for these staff, and only if they complete the time study.)
- In either case selected by the district, (all eligible or designated staff), these employees/contracted staff must at minimum, receive training (**see the contract for specific requirements**) on billable Ad Match activities and how to complete the time study.
- Randomly sampled Time Study days must have been provided by MAA to the District as the official school days during which district costs are to be

measured. If the agreement is signed later than December 1st, for time study purposes, the district's quarter will still be divided into five equal sets of school days (beginning December 1, 2003). The number of time study days (and billable cost) for the "winter quarter" may be reduced in proportion to the length of delay in start up.

4. Is the plan to pay the ESDs for training, monitoring and technical assistance out of the 3% administrative fee that MAA is charging?

Yes.

E. AD MATCH ACTIVITIES

1. Is Medical administrative activity relatable (billable) to Medicaid Ad Match if a 504 or IEP child has a health need?

The answer is generally, 'No'. Schools are required under the IDEA, and under section 504 of the Rehabilitation Act, to provide services listed in a child's Individualized Education Program (IEP) or 504 plan, respectively.

Washington's Special Education Program pays for medical services provided to eligible children and the reimbursement rates cover "collateral services" such as referral and follow-up. The 504 plan requires that the school provide similar administrative activities (related to direct medical services) for handicapped children.

The CMS Medicaid School-Based Admin Claiming Guide says on page 5, that in order for Medicaid payments to be made available for either Section 504 services or general health care services (such as health screening, school nurse services, etc.) , school providers (clinics or medical offices) must:

- a) Establish a fee for each service;
- b) Gather third party insurance information from all students served; and
- c) Bill other responsible third party insurers.

2. Would IEP meeting time be relatable/billable to Medicaid Ad Match if it turns out that a family has no insurance coverage?

No. NEW ANSWER: The meeting time that addresses child find and/or development, review or revision of an IEP is an education mandate and is not billable to Ad Match.

3. Is the time spent after an IEP meeting relatable/billable?

NEW ANSWER: Yes, it may be claimable if the activity is not a direct medical service identified in the IEP, and is an activity that is Medicaid related, i.e. Medicaid outreach, application, referral to a Medicaid provider, et cetera.

4. Is referral and coordination time relatable/billable to Medicaid if the referral is made to a mental health program that is also an education program?

This is a judgement call on the part of the district. At a minimum, the Mental Health program must be a participating Medicaid provider. Apply other filters such as, is the service an education mandate (free care), before deciding to bill Medicaid for the referral.

5. Would referrals within the school district, e.g. to a school nurse be billable?

Referrals within the district are not billable to Medicaid because they are “free care”, that is, they would be provided to all students (and education mandate). Internal referrals are those that go to the school nurse or other employees or district-paid agency staff.

6. What about follow-up care from a vision screening, etc.? Is it billable to Medicaid?

No. Follow-up care from a required school screening such as vision (called general health care in the CMS guide) is not billable because it falls under “free care”. (Free care is provided to all students, if needed.)

7. Is calling the parent because of an injury at the school considered “free care”? What if the parent asks for advice (or is simply told) about Medicaid—is this ‘free care’?

Yes, calling the parent is free care, if making such a call is the usual practice of the school or district under the circumstances.

No, If at least 7.5 minutes of the discussion with the parent is about a Medicaid resource or application, then that time is billable to Ad Match.

8. NEW QUESTION: How will I explain to my staff what is “free care” and what can be related to Medicaid?

Use examples such as the above two questions. Another approach could be an explanation such as the following.

There are certain ongoing requirements of school staff. For example, they must report suspected child abuse to Child Protective Services. Or if a teacher notices that a child has an injury, the teacher would send the child to the office and the parent or guardian would be called. Or if urgent, the school nurse would be called or other action be taken to obtain medical attention for the child. None of these

activities are Medicaid related, even if the child is enrolled in Medicaid, because the activities would be carried out for any of the school children. This “free care” would be provided to all students in similar situations.

On the other hand, if in talking with parent(s) during one of these situations, the teacher (or office staff) could do some of the following Medicaid relatable activities. He/she could inform the parents about Medicaid services, how to apply for enrollment, assist the parent to enroll by going over a Medicaid application from with them, give the parent a list of Medicaid medical/dental providers and assist the parent to get the child an appointment. The time spent doing these activities is billable to Medicaid (when tracked on a time study day).

9. What about setting up school screenings that are not mandated, i.e. oral exams that school chooses to do such as the Smile Mobile? Are these administrative activities billable under Ad Match?

Yes, if the dentist has a Medicaid provider agreement and the activity is “making referrals and/or coordinating necessary medical or physical examinations and necessary medical/dental/mental health evaluations” (see Code 9b).

F. TIME STUDY

1. NEW QUESTION: Will SD staff automatically receive alternate Time Study days or do SD staff need to request it?

Alternate time study days must be requested through the MAA system administrator. One way to do so is via <http://maa.dshs.wa.gov>, click on Admin Match/schools, then:

- Click on the “Calendar” link,
- Click on “No, I have additions/corrections”
- Enter your coordinator’s name and email address or phone
- Scroll down to the comments box and
- Request a new set of time study days or day, and state why you need them.
- At the bottom of the page, click on “Send Mail”.

2. NEW QUESTION: How long does my district have to turn in time study data to MAA?

The forms need to be signed by the supervisor within five school days of each time study date. However, just save all of your completed time study forms until you receive instructions from MAA regarding the MAA Automated system. All contracting districts must use the MAA system for computing and submitting their winter quarter, and later A-19s.

We will alert you when the system is available to enter the data and provide instructions. You will be able to key in from whatever computers you or your staff work from if they have web access. Keep your paper copy forms for possible monitoring or audit visits. MAA will need only your electronic data.

Time-study results must be entered in the system by district coordinators or their designee. If for any reason the MAA automated system is not available by the end of February 2004, MAA will provide additional instructions.

3. Will MAA provide the time study forms or do we order from the warehouse?

For the winter quarter, MAA emailed the time study forms to district Ad Match coordinators. The forms include: 1) instructions, 2) the time study form (front and back), 3) the “Tracking Guide for Referral, Coordination and Monitoring Activity” and, 4) “Tracking Activities”, a two-sided summary of school and Ad Match activities, by code number. These documents are to be copied and distributed to all designated staff or all eligible staff. Copies of the MAA Powerpoint presentation regarding the time study can also be distributed to eligible staff for use in training.

4. Can a summary by Activity Code be developed?

REVISED ANSWER: Yes. In response to the question we have developed the two-sided summary page describing each activity code. The title of this handout is “Tracking Activities” – a different form than the “Tracking Guide” which breaks out code 9b. The Tracking Activities page can serve as a reminder sheet for those participating in Admin. Match and the time study process.

5. Would the time study include only “average workload” school days in a quarter?

No. In the time study method under the new contract, all of each district’s official school days will be available to be selected randomly by MAA.

6. NEW QUESTION: Regarding sampling of school days for Educational Service District (ESD) contracts, what would be the school calendar when ESDs serve numerous School Districts?

For ESDs the MAA will randomly select five “duty days” for each quarter.

7. Will MAA notify large Districts of the sample size?

Yes. This applies only to large districts (500 or more eligible employees) that choose to time study all designated staff as well as the sample (selected by MAA) of all other eligible staff. This option is not available until 2004 spring quarter.

- 8. What about school-wide Title I? They are not required to do Time & Effort measurement. Are they required to do the Ad Match Time Study?**

Yes. REVISED EXPLANATION: The most direct way to handle this is to complete the time study on the five MAA selected days. If your district chooses not to do the time study, it is recommended that you ask for guidance from your district's federal programs specialist or OSPI.

- 9. Will some School Districts where funding is not tied to an individual employee (Title I districts) get specific instructions for billing?**

Answer: See the question above.

- 10. Why do school staff have to track non-billable activities?**

REVISED ANSWER – Medicaid Ad Match activity is significantly different from other school activities. These events happen occasionally or may not happen at all during a day. The time study is a measure of these random events and is used to allocate the appropriate percent of staff time to Medicaid. Thus it is essential that participating school staff record the entire day's events, not just Ad Match events.

- 11. Regarding random sampling of Time Study days, what if the district has both a school calendar for most school buildings and an alternative calendar for specialized schools in the district?**

The district will need to notify MAA that they operate two separate "school calendars" and the district's Ad Match coordinator will have to report the time study for the two groups of school buildings separately. MAA will provide additional instructions to any district reporting that they have more than one calendar for schools in the district. **ADDED INFORMATION:** The district will need to identify each of their eligible staff with one of the calendars (or with both if staff are shared).

- 12. Could the first sample day occur later than the first two weeks of the quarter so the district would have more time to train?**

No. NEW EXPLANATION: Staff must be trained before their work-time can be billed to Medicaid Ad Match. Because each time study day represents one fifth of the quarter being sampled, the days can not be lumped together near the end of the quarter. Untrained staff will get zero activity time on selected time-study days that occur after the start of the quarter and before they have been trained.

13. Once the School Ad Match Coordinator has been notified of the five days selected, can the school district reschedule or schedule training, conferences or other activities for those days so that the activities can be claimed?

No. The Federal government reimburses the school district based on the accuracy and validity of the time study. Therefore, it is important that the time study reflect the regularly scheduled activities. Only if the time study day happened to fall on a regularly scheduled training day or other regularly scheduled event, would it be appropriate for the staff to record those activities on the time study.

14. If the activities conducted by the staff completing a time study do not fall under a normally billable code, can the staff select another code similar that is billable?

No. It is essential to the claiming process, that the time study accurately reflect the activities conducted by staff.

15. Can partially federally funded staff complete a time study? If yes, do they report their full contracted workday?

Yes to both questions. That portion of their costs not funded by federal funds can be used for local match and thus to bill for Medicaid Ad Match activities. Track and record the full days work and the MAA automated system will compute the allowable portion of time worked that is Medicaid related.

CAUTION: If a given period of time during the time-study day is federally funded, Medicaid should not be billed for Ad Match activities that are done during that time, regardless of whether or not the activity would be otherwise billable to Medicaid ad match.

16. If the staff is out due to illness or vacation on one of the selected days, and a substitute fills in for him/her, can the substitute complete the time study?

No, NEW EXPLANATION: For districts that have chosen to use only “Designated Staff”, the designated person should complete the time study when sick or on vacation showing the paid hours for that day as code 10 (System support – paid time not at work). This would also apply in Spring quarter of 2004 for large districts that choose to use designated staff plus an MAA selected SAMPLE of eligible staff.

ADDITIONAL INFORMATION:

Yes, for districts that OPT for all eligible staff to participate – as long as the substitute was trained on Ad Match activities and on completing the Time-Study beforehand. **Caution:** The district will need to update information on substitute

teachers and their costs, in the MAA automated system (available by mid to late February).

17. If the staff attend training or another activity on a day that is not a time-study day, can the staff claim for the activity? Can they put it on the time study?

No. Only the selected days can be recorded and the activities must reflect the actual (both Medicaid and school related) activities conducted that day. The validity of the time study is based on the equal chance that any day could be selected and that staff will accurately record that day's activity.

18. Can someone else fill in the time study for the staff?

No. It is important the staff complete the time study to ensure its accuracy. Also, the staff must sign the time study certifying to the accuracy. The supervisor must also sign the time study.

19. Why can't the school district claim the cost of Ad Match time spent by superintendents and business office staff?

It is MAA's understanding that Business Office Staff and Superintendents are coded to Program 97. These employees support all district programs and are used to calculate the "unrestricted indirect rate". The district's indirect cost amount is added to the allowable "direct" Ad Match costs in computing the Medicaid Ad Match bill (A-19 voucher).

20. When would the time study have to be turned in to the supervisor?

Within 5 workdays after each time study day, the time study form and back-up Tracking Guide (if claiming Medicaid related "Referrals, Coordination and Monitoring" – code 9b), must be signed by the employee, turned in to their supervisor and signed and dated by the supervisor (or his/her official designee).

21. Do we need to allow 5 days to obtain signatures since mail is slow?

If it is known that mail within the district going from staff completing the time study to their supervisor, will take longer than five workdays from the time-study date, the district may take action as follows. The Ad Match Coordinator or another district staff person whose level of responsibility is comparable to the participating staff member's Supervisor, may be given written authority to approve and sign the time study form received from staff participants. Documentation of that signature authority must be available to auditors or to MAA or it's representative who is monitoring the Ad Match program, and must be allowable under the district's policies, rules and regulations.

22. Which school district staff are eligible/not eligible to participate in the time study?

See the Time Study component of the Manual. “Program Codes” are listed for categories of staff who are not eligible. These include staff who are entirely federally funded, are generally included in the Indirect Administrative cost, or are not generally considered to have a role in School Administrative Match. If your district feels that an employee who is in a non-eligible program code should be eligible, you must have on file, the justification for your decision to bill Medicaid for his/her Ad Match costs.

23. Are Educational Staff Associates (ESA) eligible to complete the Time Study?

EXPANDED ANSWER: If ESAs are paid staff, not included in a program code that is ineligible for participation, are paid from funds available for Medicaid match, and are trained as required in the contract, then they could participate in school admin match and the time study. **CAUTION:** Assess the conditions (filters) for billing Medicaid, such as the free care principle, to activities of ESAs.

24. Are agency employees considered School District employees? (Are they eligible to complete the Time Study and the cost of allowable activities claimed)?

REVISED ANSWER: Whether or not a person is an employee is an interpretation of IRS rules. For an employee, the employer is responsible for withholdings, payroll related charges and deductions and must report income through the W2. An independent contractor’s income is reported through an IRS form 1099 if the dollar threshold is met.

Yes, agency employees are eligible to complete the time study if they are not included in the program categories that are excluded, for example those which are 100% federally funded, are part of overall administration (support to all programs), or have duties that do not include time/work with students.

CAUTION: Once the district’s A-19 is being compiled using the MAA automated system, agency employees’ total cost and the local matching funds will have to be reported separately from those of the contractor’s employees.

25. What code does the Coordinator’s time fall under?

The coordinator is to complete the time study following the rules that are applicable to all designated or eligible staff. That is, while carrying out their “normal activities” on the time study day, they code their activities on the time study form that best fits the work performed during each 15-minute increment of the workday. **ADDED NOTE:** If the coordinator’s position is in the district’s Program 97 code, the coordinator’s time will be reimbursed as part of indirect administration and he/she is not eligible to complete the time study.

26. Is the Tracking Guide only for activity Codes 9a and 9b?

Use the Tracking Guide only for activity 9b. The form has been modified based on input from the Advisory Committee and is to be completed whenever activity 9b is billed.

27. NEW QUESTION: Regarding approval of the completed Time Study, can a district delegate signature authority to someone other than the supervisor?

Yes, if the district has in its personnel policies, wording that would enable the district to make such a decision. If the district delegates signature/approval authority, the district should document the change in their records.

28. What activity code should districts use for the work of an “assistant to the coordinator”? What about the coordinator’s time? Clerical time?

REVISED ANSWER: All participating staff are to complete the time study using the best fit (by activity code) for the work they are doing during each 15 minute increment of each time-study day.

Clerical activities (“paper work”), and travel associated with each activity code (1,2,5,7,8 or 9 “a” or “b”) can be included as time used on that activity code.

Some clerical time is not part of a Medicaid Ad Match activity, (outreach, referral, arranging of transportation, training or planning of outreach and linkage). For example, distributing or gathering time study forms or entering time study data into the MAA automated system. These are not in direct support of one of the outreach, linkage, training or planning activities. If this general clerical work happens on a time study day and the person doing the entry is also designated or eligible to participate, that time must be tracked/recorded as code 10, “System Support”. (A portion of Code 10 costs are reimbursable by Medicaid.)

29. Regarding time study recording of paperwork, clerical activities and staff travel, must all such work be coded to Activity 10, “System Support”, or can the paperwork, time and travel related to each activity be recorded in those separate activities?

See the answer to question 29 above.

30. NEW QUESTION: Do partially federally funded staff track only non-federal time on Time Study or as fully contracted?

The individual must record 100 percent of their contracted hours on the time study day. Activities conducted during time on federal payroll should not be

billed to Medicaid Ad Match, but rather be tracked under the non-billable cod for that activity.

G. BILLING MEDICAID

- 1. Regarding eligibility of staff to participate in Ad Match, staff coded in programs 76 and 77 should not be excluded from participation and those in program 52 should be excluded.**

The list of program codes for non-eligible staff can be found in the Manual. (See the “Time Study” link in the Manual). This list is a guide to districts to use to avoid possible audit findings. Each district must use their judgement and knowledge of their funding and personnel systems. If a time study is reported for an individual included on the non-eligible list, we ask that the rationale for the decision be written and retained for monitoring or audit purposes.

- 2. Would school district staff have to use the Claim Worksheet?**

No. The claim worksheet is only for purposes of understanding the method used by the MAA automated system to generate the contractor’s A-19. **NEW INFORMATION:** The automated system will be beta tested in late January, and training will be available in late February/Early March. The system will use:

- Employee name (or name of person who is providing work time but is not an employee),
- Cost data reviewed and approved by the contractor,
- The Medicaid Eligibility Rate (MER) set by MAA,
- The district’s Unrestricted Indirect Rate approved by OSPI, and
- Time study data entered by the contractor.

The system will compute the amount billable to Medicaid and create an A-19 invoice for review, approval and signature by the district.

CAUTION: To be billable to Medicaid Ad match, school based activity provided by non-employee staff will have to be reported on the MAA time study sheets. The associated cost will have to be entered in the MAA automated system.

- 3. Can staff whose responsibility and job description is entirely Ad Match be billed directly to Medicaid (at 50% federal match) without having to do the time study?**

No. Under the new contract (effective December 1st), Ad Match expenses will only be billable to Medicaid based on time-study results.

4. **NEW QUESTION:** Will districts be able to send MAA state salaries and benefit information (S275 is year-old data)? The monthly claim won't be accurate due to changes in salaries data. Payroll numbers won't match up to what's in the system. It is critical to have monthly upload of SD payroll data, at least quarterly.

The MAA automated system will provide a list of personnel and their related cost acquired through OSPI. Because S275 reports are due to OSPI at the end of December, the data that MAA receives for winter quarter, will be reasonably current. The district coordinator will have the opportunity to make corrections and additions or deletions to their data each month. The system will have the capability to set an effective date so that the correct costs will be applied to each time study day.

5. **For billing purposes, does it matter if referrals to Medicaid providers are for Medicaid or non-Medicaid children? What about children/families with unknown status?**

No it doesn't matter. When the district bills for referral of children to Medicaid providers, the Medicaid Eligibility Rate (MER) will continue to be applied. The CMS guide requires this discount on Medicaid reimbursement for referrals. The logic is that each school child being referred to a Medicaid provider has the same likelihood of being covered by Medicaid as would occur if all students were referred and the cost of referral was being reimbursed only for students who are enrolled in Medicaid.

6. **Are a district administrators' billable costs based on contract hours or on "hours worked per day"?**

Contract hours. (Contracted salary and fringe benefits divided by contracted days, usually 220 per year).

NEW INFORMATION: The above answer applies to winter quarter. For Spring quarter MAA is examining the possibility of using contracted days and allowing the hours per day to vary. Cost per hour would equal the contracted dollar amount per day, divided by actual hours worked. Time study days would still be only on "school days".

7. **Will the requirement of referring to a Medicaid provider be satisfied if the district provides the family a list of providers, rather than to a specific one?**

The CMS Medicaid School-Based Administrative Claiming Guide requires that to be billable, a referral must either be made to a health care provider who has a "Provider Agreement" with MAA, or the district's cost of making the referral must be reduced by the Provider Participation Rate (PPR). In order not to incur

this PPR reduction, districts must refer students/families only to providers who have a Medicaid agreement. Providing a list of Medicaid providers to the family would meet the requirement. For the referral to be effective, the district may decide to follow-up to assure that the health problem is addressed.

NEW INFORMATION: For students who are enrolled in a managed care plan (Medicaid “Healthy Options”), a referral of the child to the plan’s customer service office, in order to secure a health plan doctor, dentist or other provider, or to receive a plan service, is acceptable as a referral to a Medicaid provider.

8. Will the new automated system generate reports and what will be its capability?

More specifics will be available in February. There will be beta testing in late January/early February. The new system will be able to:

- a. Use various browsers.
- b. Accept time study data.
- c. Enter user comments.
- d. Compute the District’s A-19.
- e. Generate reports.

9. NEW QUESTION: Will districts be able to create their own forms to batch into MAA system?

If this is the correct interpretation of the question, the contract requires that the district follow MAA instructions. This would include the time study forms provided on the MAA webpage. If a district chooses to create their own forms and they are monitored by MAA or audited by the State Auditors office, the forms may be found out of compliance with instructions/the contract.

10. What about the districts that purchase (contract) for psychiatrist, nurse and other clinical services, rather than employ them. Is their time billable to Ad Match?

REVISED ANSWER: It may be if the service is not provided by federally funded people, the service is provided on one or more time study days, the person in question completes the time study, the activities meet the conditions of being relatable to Medicaid, and the contracted cost is reported to MAA in the automated system. The district must retain documentation of the cost of such services.

In general, clinical staff are providing direct medical services which would not qualify. The “filters” that are applicable to ad match activity (such as “general health care”, “free care”, direct medical care), must be applied to nurse, counselor and other professional services staff activities as well as to all other participants.

11. When and how will MAA integrate the current MER into it's automated system?

The automated system will be available for compiling the A-19 voucher for the winter quarter of 2003-04. Each district's MER will be used by the automated system in computing their billable costs.

12. Can the school district choose to bill directly for PROGRAM 97 staff costs and not apply the indirect rate?

Program 97 is District-wide Support code. These functions and activities support and benefit many different programs and cannot be singled out to the other program activities within the district. Program 97 costs are used to calculate the indirect rate so that through the application of the appropriate indirect rate, the support costs can be charged to the programs in relationship to the benefit derived from those support activities. Staff costs coded to Program 97 are assumed not to be attributable to other programs or activities. Therefore, Program 97 staff costs should not be billed as direct costs to School Ad Match.

13. NEW QUESTION: How is the dollar amount (maximum consideration) on the district's contract computed? Is this amount a target to shoot for?

The "maximum consideration" is an arbitrary amount computed by multiplying \$350 per month, times the number of children receiving Free or Reduced Price meals. This is multiplied by the number of months from beginning to end of the contract.

No, this is not a target to shoot for. Your district can be reimbursed up to this amount but no more, unless the agreement is amended.

14. NEW QUESTION: Explain how Activity Code 10 works. How does the pro-rating work?

Code 10, "System Support and or Personal Time" is for breaks, lunch, etc. and the cost is prorated to Medicaid as follows:

- An individual is contracted to work 7 hours per day.
- The person spends 30 minutes or 7.1% of the day doing code 10 activity.
- The person spends 5% of their day doing Medicaid Ad Match activity.
- Claimable Code 10 cost is $.071 \times .05 = .00355$ times the person's total monthly cost.
- If the person's monthly cost is \$5,000 then the cost of Code 10 activity billable to Medicaid is $\$5,000 \times .00355 = \17.75 .

15. NEW QUESTION: Is there some concise picture of what is now billable?

Activities that are most clearly Medicaid related are outreach and assistance with Medicaid applications. The activities include identifying potentially eligible students, educating them and their family about Medicaid services and about Medicaid eligibility, and assisting them to enroll in Medicaid. Other clearly related activities are providing, or receiving Medicaid related training, and participating in planning the district's overall Medicaid outreach and linkage.

Referral to providers and follow-up activities may be billable to Medicaid but must meet certain conditions. For example, the activity must be more than or in addition to the required or standard activities provided to all students (not free care), not a Special Education requirement, not follow on required screening, or provided to a section 504 (handicapped) student.